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3125-508

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

NOV 8 1999

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

John Thornton
Bayer Corporation, Agriculture Division
8400 Hawthorne Road
P.O. Box 4913
Kansas City, MO 64120-0013

Subject: Merit 0.2 Granular Insecticide
EPA Reg. No. 3125-508
Application for amended registration dated October 22, 1999 and
resubmission dated November 5, 1999 - Label revision and alternate brand
name.

Dear Mr. Thornton,

This letter supersedes our letter dated October 28, 1999 regarding EPA Reg. No. 3125-508. Your proposed revised label, which was submitted in finished format on October 22, 1999 and resubmitted November 5, 1999, has been reviewed. The label is acceptable at this time provided you make the changes indicated below at the next printing of your label.

1. The statement "FOR OUTDOOR RESIDENTIAL USE" was included on the front panel of the last stamped accepted label (May 19, 1999) and must be added to the front panel of the revised label.
2. As you know, EPA will soon be issuing a PR Notice concerning improvements to the format and content of "First Aid" statements (formerly "Statement of Practical Treatment") on all pesticide product labels. The "First Aid" statements in the upcoming PR Notice will supersede the statements that are listed in the December 1996 Label Review Manual. In addition, EPA is currently revising the Label Review Manual; the revised manual will incorporate the updated "First Aid" statements from the PR Notice. At this time, we recommend that you incorporate the updated "First Aid" statements on your new product label by revising the instructions under "FIRST AID" to read as follows:

"IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor.

"IF IN EYES: Hold eye open and rinse slowly and gently with

water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing the eye. Call a poison control center or doctor for treatment advice."

You may continue to use the same format for the First Aid section that is used on your label submitted November 5, 1999 (i.e. the box format with the headings "IN CASE OF ACCIDENTAL.....SWALLOWING, CONTACT WITH EYES" - followed by the above text in bullet format).

Since the label submitted on November 5, 1999 is in finished format and is substantially similar to the last accepted label (stamped May 19, 1999), and since the revisions requested above do not raise risk concerns associated with the use of this product, we will allow you to use this labeling for a period not to exceed January 31, 2000. Products released for shipment after January 31, 2000 must bear labeling revised in accordance with this letter.

Please submit one copy of your revised final printed labeling before you release the product for shipment. If the above specified conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

A stamped copy of the label is enclosed for your records. If you have any questions regarding this letter, please contact me by phone at (703) 305-5417 or via E-mail at Perreault.peg@epamail.epa.gov.

Sincerely yours,



Peg Perreault
Chemical Manager, Team 4
Insecticide-Rodenticide Branch
Registration Division (7505C)

Enclosure (1)

Bayer



ADVANCED LAWN

ACCEPTED
COMMENTS
In EPA...
Nov. 8, 1999

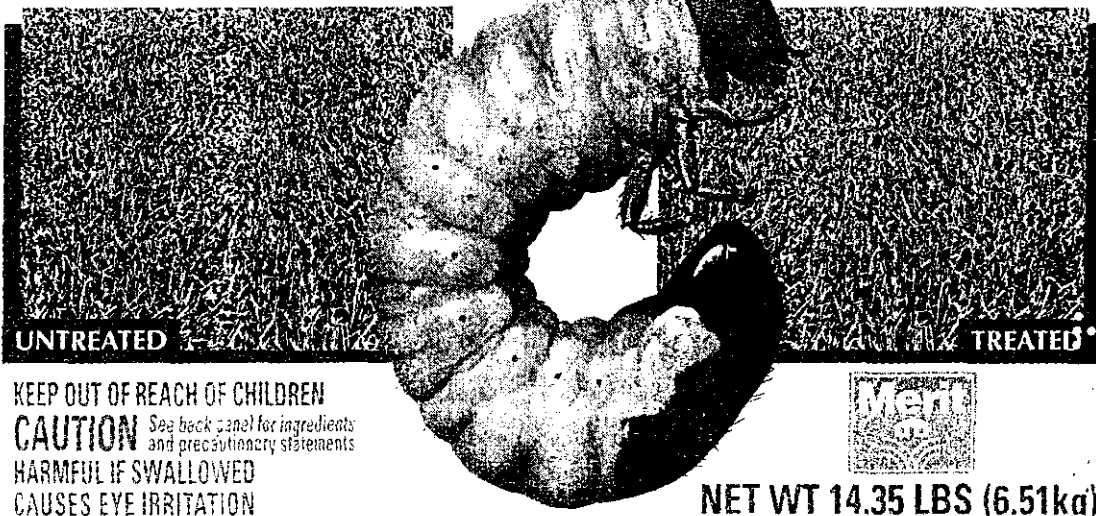
Under the Federal Insecticide, Fungicide, and Herbicide Act as amended, for the pesticide registered under EPA Reg. No. 3125-508

TREATS
UP TO
5,000
SQ FT

Season-Long Grub Control

READY-TO-SPREAD GRANULES

- ▶ One application kills grubs all season long
- ▶ Apply anytime spring through late summer
- ▶ For use on lawns, ground covers & flower beds
- ▶ Also kills mole crickets



ADVANCED LAWN Bayer
Season-Long Grub Control

Season-Long Grub Control



Season-Long Grub Control

READY-TO-SPREAD GRANULES



Season-Long Grub Control

Bayer Advanced Lawn Season-Long Grub Control kills grubs all season long with a single application. Keeping your lawn free of damaging grubs has never been easier.

READY-TO-SPREAD GRANULES

READ THE LABEL FIRST!

QUICK FACTS

- One Application Kills Grubs All Season Long
- Kills White Grubs Before They Damage Lawns
- Easy-to-Use Granules

KILLS	White Grubs (larvae of Chafers and Japanese Beetles), and Mole Crickets
COVERAGE	This bag covers up to 5,000 sq ft (3,775 sq ft for Mole Crickets)
WHERE TO USE	Lawns, Flower Beds, Ground Covers, and around Trees & Shrubs
WHEN TO USE	May through mid-August
HOW MUCH TO USE	See spreader settings

For questions or comments, call toll-free at 1-877-BayerAL or visit us on-line at www.AdvancedLawn.com

INGREDIENTS

ACTIVE INGREDIENT:	Imidacloprid	0.2%
OTHER INGREDIENTS*		99.8%
		100.0%

*Other ingredients include: Corn cob granules and dipropylene glycol to adhere the active ingredient on the granules. Imidacloprid is the chemical name for Merit® insecticide.

EPA Reg. No. 3125-508

EPA Est. No. indicated by 2nd and 3rd digits of the batch number on this package.

071 = 070989-MO-001 (46) = 5905-1A-01

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. For best results, read and follow all label directions.

BEFORE YOU USE
Read and follow these directions when using:

- Do not apply near fish pools, ponds, streams or lakes.
- Do not use in vegetable gardens.

HOW TO USE

TO CONTROL	WHEN TO APPLY
GRUBS	Apply once anytime from May through mid-August.
MOLE CRICKETS	Apply once anytime from mid-May through mid-June. Florida residents: Apply once anytime between early April through early May
LAWNS	<p>For best results, apply Season-Long Grub Control before grubs or mole crickets hatch. Contact your County Extension Agent for the ideal dates to apply in your area.</p> <p><i>How Much:</i> See Spreader Settings <i>How to Apply:</i> Adjust spreader to the proper setting (see Spreader Settings). To be sure you cover the entire area uniformly, first treat the border of the lawn then fill in the center. Make parallel passes, walking at a steady pace to ensure even distribution of the granules. Water thoroughly after applying.</p>
FLOWER BEDS, GROUND COVERS, TREES & SHRUBS	<p><i>How Much:</i> 2 Tablespoons per 10 sq ft of planting bed. 1-1/4 cups per 100 sq ft of planting bed.</p> <p>Spread granules evenly to the soil over flower beds, ground cover plantings, shrub beds and under trees. TIP: A hand-held spreader makes this easy. Rake granules into the soil around plants. Water thoroughly after applying.</p>
FOR BEST RESULTS WITH GRUBS & MOLE CRICKETS	<p>Children and pets may re-enter after the treated area has been watered and allowed to dry.</p> <ul style="list-style-type: none"> • Apply early, before grubs and mole crickets hatch. • Water thoroughly within 24 hours after applying. • Do not mow until the granules are watered into the soil. • Avoid applying Season-Long Grub Control to waterlogged areas, as this may decrease the product's effectiveness. • You may spread Season-Long Grub Control over soil or mulch. If present, remove weed barrier before applying.

SIGNS OF DAMAGE TO LAWNS

GRUBS

White grubs cause extensive damage to lawns by feeding on grass roots. Grass turns yellow, then brown and dies. Grubs chew at roots so that the grass is easily pulled up in pieces with your hands. You can roll it back like a carpet to reveal the grubs. If patches of dead grass appeared in your lawn late last summer, check for grubs.



MOLE CRICKETS

Mole crickets often cause extensive damage by tunneling through lawns. Some species also feed on roots. Tunneling uproots the grass so it easily dies but lawns turn yellow, become thin, weedy and can eventually die.

HOW IT WORKS FOR GRUBS AND MOLE CRICKETS

After Season-Long Grub Control granules are watered in, a protective zone is formed in the soil. If applied early, Season-Long Grub Control kills grubs and mole crickets when they hatch - before they can cause damage.

Spreader Settings

If your spreader is not listed, please call our Consumer Service Hotline at 1-877-BayerAL for help.
Rate for Grubs: 2.87 lbs per 1,000 sq ft
Rate for Mole Crickets: 3.8 lbs per 1,000 sq ft

SPREADER SETTINGS

Broadcast Spreader		2.87 lb Rate	3.8 lb Rate	Distance Between Passes (FT)
Model	Setting	Setting	Setting	Passes (PL)
CYCLONE ROTARY	4.5		4.75	4.0
EARTHWAY ROTARY	11		12	2.5
EVAN-SPREAD	11		12	2.5
K-CARD ROTARY	2.0		2.5	4.0
ORTHO ROTARY	2.0		2.5	4.0
PRECISION ROTARY (#5850)	4.0		5.0	2.5
RED DEVIL ROTARY	4.0		5.0	2.5
REPUBLIC EZ ROTARY (#5440)	2.0		2.5	4.0
SCOTT'S EASYGREEN (MFG-3)	27		28	2.5
SCOTT'S SPEEDYGREEN 1000	2.0		3.0	3.0
SCOTT'S SPEEDYGREEN 2000	4.5		7.0	5.0
SCOTT'S SPEEDYGREEN 3000	4.5		7.0	5.0
SEARS ROTARY	2.8		3.5	4.0
TRUE TEMPER ROTARY	4.5		4.75	4.0
VICORD ROTARY	4.0		5.0	2.5

Drop Spreader		2.87 lb Rate	3.8 lb Rate	Distance Between Passes (FT)
Model	Setting	Setting	Setting	Passes (PL)
AMES DROP	7.5		8.0	N/A
K-CARD DROP	8.5		9.5	N/A
ORTHO DROP	8.5		9.5	N/A
PRECISION DROP (#F122G)	1.5		1.75	N/A
RED DEVIL DROP	1.5		1.75	N/A
REPUBLIC EZ DROP (#530)	8.5		9.5	N/A
SCOTT'S ACCUGREEN 1000	7.75		8.75	N/A
SCOTT'S ACCUGREEN 2000	7.75		8.75	N/A
SCOTT'S ACCUGREEN 3000	4.5		7.25	N/A
SCOTT'S DROP (MFF), PF2, PF3, PF4	4.5		7.0	N/A
SEARS DROP	8.5		9.5	N/A
STA-GREEN DROP	7.5		8.0	N/A
VICORD DROP	1.5		1.75	N/A

*Settings are approximate. The condition of your spreader, the speed at which you walk and uneven terrain may affect the rate of application. Calibrate your spreader according to manufacturer's directions.

TIP: 1000 sq ft = 20 ft x 50 ft

Do not use a spreader that applies granules in narrow, concentrated or uneven bands. Be sure the spreader works properly and spreads granules evenly.

IMPORTANT - Directions for Storage and Disposal

STORAGE CONDITIONS	Store in original container in a cool, dry place, out of the reach of children, preferably a locked storage cabinet.
DISPOSAL	<ul style="list-style-type: none"> • Do not contaminate water, food, or feed by storage or disposal. • Do not reuse empty product bags. • Securely wrap the empty product bag in several layers of newspaper. • Place bag in trash.

Important: It is best to use all of the product in accordance with label directions. If it is necessary to dispose of unused product, please follow any applicable state or local guidelines.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals	<ul style="list-style-type: none"> • Harmful if swallowed or absorbed through skin. • Causes eye irritation.
CAUTION	<ul style="list-style-type: none"> • Avoid contact with skin, eyes, or clothing. • Wash thoroughly with soap and water after handling.

FIRST AID

IN THE CASE OF ACCIDENTAL ...	IMMEDIATELY ...
SWALLOWING	• Call a doctor or poison control center for further treatment advice.
CONTACT WITH EYES	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water. • Continue to rinse eye for 10 to 15 minutes. • Call a doctor if irritation persists.

NOTE: When calling poison control center, have this product label accessible. If seeking treatment at an emergency room or doctor's office, bring this product label to show medical personnel.

For medical emergency information, you may call toll-free 1-877-229-3763. Active Ingredient: Imidacloprid 1 [CAS # 119261-41-3]

ENVIRONMENTAL HAZARDS

- This pesticide is highly toxic to aquatic invertebrates. Do not apply directly to water.
- Do not contaminate water when cleaning equipment or disposing of equipment wash water.
- Apply this product only as specified on this label.

NOTE: Research and testing has determined that the "Directions for Use" are appropriate for the proper use of Season-Long Grub Control under expected conditions. The Bayer assumes responsibility for lack of performance or safety if not used according to the directions.

Money Back Guarantee: If you are not satisfied with this product, we will gladly refund your original purchase price.

Made in USA

Distributed by
Bayer Corporation
Customer & Professional Care
Box 9913
Kansas City, MO 64110-0913

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